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John Doe #2 (IP address 174.44.8.7)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

PATRICK COLLINS, INC.,

Plaintiffs

VS.

JOHN DOES 1-13

Defendants

Civil Action No. 3:12-cv-07620-PGS-TJB

NOTICE OF MOTION TO QUASH

Notice is given that on June 17, 2013, or as soon thereafter as the Honorable Court will allow, Defendant, John Doe #2 (identified as allegedly having IP address 174.44.8.7), by and through counsel Ernest D. Buff, Esq. of Ernest D. Buff & Associates, LLC, will respectfully move the Honorable Tonianne J. Bongiovanni, U.S.M.J., at the United States District Court in Trenton, New Jersey for an Order to Quash the Third Party Subpoena issued to Defendant's Internet service provider, Optimum Online, c/o CSC Holdings Inc. (Cablevision), seeking confidential and proprietary identity information.

This motion will be made on the grounds that the Order is necessary, because: (i) the Third Party Subpoena seeks to obtain protected information, which would subject John Doe #2 to an undue burden in the form of undeserved reputational injury, embarrassment and harassment; and (ii) the subpoena seeks information that is not relevant, given

Plaintiff's failure to link John Doe #2 to alleged copyright infringement activity.

The grounds for this motion are more fully set forth in the accompanying "Brief in Support of Motion to Quash by Defendant John Doe #2" and "Certification of Ernest D. Buff, Esq."

A handwritten signature in black ink, appearing to read "Ernest D. Buff", with a long horizontal line extending from the left side.

Counsel for Defendant, John Doe #2
Ernest D. Buff, Esq.
ebuff@edbuff.com

DATED: May 15, 2013